



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

January 30, 2009

TO: Interested Parties

RE: Notice of Issuance of Permit to Construct
Coble's Construction and Demolition Landfill
Alamance County, North Carolina

Notice of Issuance of Sanitary Landfill Permit

You expressed an interest in the Application for a Construction and Demolition (C&D) Solid Waste Landfill Permit filed by Coble's C&D Landfill to conduct solid waste disposal activities located at 5833 Foster Store Road, east of the community of Kimesville, in Liberty, Alamance County, North Carolina. This is a notice to you that the North Carolina Department of Environment and Natural Resources Division of Waste Management issued Permit Number 01-05 on January 30, 2009.

A copy of the Final Permit, Fact Sheet, and Responses to Public Comments is available to interested parties. The information may be viewed on the internet at <http://www.wastenotnc.org/news.htm> then following the Public Notice links to Coble's C&D Landfill.

The permit record may be viewed by appointment from 9 AM to 4 PM, Monday-Friday, at the Division of Waste Management, 401 Oberlin Road, Raleigh, NC. Requests for additional information or a copy of the above may be made to:

Ming Chao, Division of Waste Management
1646 Mail Service Center, Raleigh, NC 27699
Telephone: (828) 296-4500, Fax (828) 299-7043
Email: Ming.Chao@ncmail.net

North Carolina law allows persons aggrieved by the issuance of a solid waste permit to contest the decision by filing a petition for a contested case in the Office of Administrative Hearings pursuant to North Carolina General Statute 150B-23 of the Administrative Procedure Act.

If you believe you are an aggrieved party as defined under the Administrative Procedure Act (the Act) may file a petition for a contested case with the Office of Administrative Hearings within 30 (thirty) days of the date of this notice to you in accordance with North Carolina General Statute 130A-24.

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Telephone 919-508-8400 \ Fax 919-733-4810 \ Internet <http://www.wastenotnc.org>

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If you believe that you are an aggrieved party within the meaning of the Administrative Procedure Act, a petition for a contested case must be filed with the Office of Administrative Hearings within thirty (30) days of the mailing of this notice to you (North Carolina General Statute 130A-24).

If you file a contested case petition, it must be in writing and in the form prescribed by North Carolina General Statute 150B-23(a). See the excerpt at the end of this notice for further information. You must file the original petition and one copy with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina, 27699-6714.

You must also serve the Department of Environment and Natural Resources by mailing a copy of the petition to Mary Penny Thompson, General Counsel, Department of Environment and Natural Resources, 1601 Mail Service Center, Raleigh, North Carolina 27699-1601.

Any questions about filing a petition should be directed to the Clerk of the Office of Administrative Hearings, telephone number: (919) 733-2691. You may also view the North Carolina Office of Administrative Hearings documents on their web site at www.ncoah.com.

Thank you,

Department of Environment and Natural Resources
Division of Waste Management / Solid Waste Section

Excerpt from N.C. General Statute 150B Administrative Procedure Act

§150B 23. Commencement; assignment of administrative law judge; hearing required; notice; intervention.

(a) A contested case shall be commenced by filing a petition with the Office of Administrative Hearings and, except as provided in Article 3A of this Chapter, shall be conducted by that Office. The party who files the petition shall serve a copy of the petition on all other parties and, if the dispute concerns a license, the person who holds the license. A party who files a petition shall file a certificate of service together with the petition. A petition shall be signed by a party or a representative of the party and, if filed by a party other than an agency, shall state facts tending to establish that the agency named as the respondent has deprived the petitioner of property, has ordered the petitioner to pay a fine or civil penalty, or has otherwise substantially prejudiced the petitioner's rights and that the agency:

- (1) Exceeded its authority or jurisdiction;
- (2) Acted erroneously;
- (3) Failed to use proper procedure;
- (4) Acted arbitrarily or capriciously; or
- (5) Failed to act as required by law or rule.

The parties in a contested case shall be given an opportunity for a hearing without undue delay. Any person aggrieved may commence a contested case hereunder.



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

January 30, 2009

FINAL FACT SHEET AND PERMIT DECISION
SOLID WASTE PERMIT NUMBER 01-05

Doc Id No: 6678

FACILITY: Coble's Construction and Demolition Debris Landfill (C&DLF)
COUNTY: Alamance
CITY: Liberty, North Carolina
OWNER/OPERATOR: Coble's Sandrock, Inc.
5833 Foster Store Road
Liberty, North Carolina 27298

NOTIFICATION OF FINAL PERMIT ACTION

On January 30, 2009, the Division of Waste Management (Division) issued Solid Waste Permit No. 01-05, Part 1: Permit to Construct, for Coble's Sandrock Construction and Demolition Debris Landfill (C&D Landfill). The permit approves the overall facility plan allowing Coble's Sandrock C&D Landfill to increase waste disposal capacity and lateral expansion of the facility boundaries and specific construction of Phase 3 (Phases 3A and 3B). The Division has determined that the proposed facility plan, engineering plan, construction quality assurance plan, operation plan, closure and post-closure plan, and monitoring plans, as identified in the application, satisfies the requirements and intent of the North Carolina Solid Waste Management Rules as codified in 15A NCAC 13B .0531, et seq.

DESCRIPTION

Coble's Sandrock, Inc., applied for a facility expansion onto 114.4 acres of adjacent property which will bring the total facility acreage to approximately 154.2 acres and increase total disposal capacity to approximately 6,935,903 cubic yards. Construction and operation of a new Phase 3 (Phases 3A and 3 B) of lateral expansion of the landfill unit were also proposed by Coble's Sandrock, Inc. The proposed 5-year phase landfill unit consists of Phase 3A (6.36 acres) and Phase 3B (5.87 acres) and has a total capacity of 836,250 cubic yards. The average disposal rate will be up to 600 tons per day. No changes are made to increase the volume (ton per day) and service areas that the facility is permitted in a franchise approved by the Alamance County Board of Commissioner in 1994 and renewed in 2007.

The Coble's Sandrock Construction and Demolition Debris Landfill (C&D Landfill) is owned and operated by Coble's Sandrock, Inc. The landfill facility is located at 5833 Foster Store Road, east of the community of Kimesville, in Liberty, Alamance County, North Carolina. The facility encompasses a total of 154 acres. The approved facility consists of 8 (eight) 5-year development phases, the first two (Phases 1 and 2) of which are completed and the third (Phase 3) is approved by this permit action for construction. The life of

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Phase 3 is approximately 5 years. Phase 4 through Phase 8 provide approximately 25 years of disposal capacity.

This C&D Landfill unit is permitted to dispose of land clearing and inert debris, and construction and demolition debris resulting solely from construction, remodeling, repair or the demolition of pavement, buildings or other structures. Hazardous wastes or other banned wastes such as municipal or industrial solid wastes, liquid waste, medical waste, radioactive waste, asbestos contained material, PCB wastes, yard trash, white goods, septage, sludge, and special wastes are not approved for disposal.

The facility has a permitted capacity of approximately 6,935,903 cubic yards, which will be filled at an average rate of approximately 600 tons per day.

PUBLIC COMMENT PERIOD

The Division held a 45-day public comment period on the draft permit. The comment period began June 22, 2008, and ended August 05, 2008. The draft permit was available for review by appointment from 9 AM to 4 PM, Monday through Friday at the Division of Waste Management at the address shown below. The Division also conducted a public hearing on Monday, July 21, 2008, at 6:30 PM at Snow Camp Fire Department located at 8416 Snow Camp Road, Snow Camp, North Carolina. Interested parties presented oral or written comments on the draft permits and conditions and made available as part of the administrative record and considered in making the final determinations regarding the permit. Comments are addressed in the attached document.

DIVISION CONTACT

Ming-Tai Chao, P.E.
Solid Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Phone Number: (919) 508-8507
Fax Number: (919) 733-4810
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January 30, 2009

Response to Public Comments Proposed Coble's C&D Landfill Expansion Permit No. 0105-CDLF-1998

Guide to Acronyms and Definitions

C&DLF: Permitted North Carolina Construction and Demolition Landfill(s).

DWM: NC Department of Natural Resources Division of Waste Management.

MSW: Municipal Solid Waste as defined in NCGS 130A-290

NCGS: North Carolina General Statutes.

Solid Waste Rules .05XX: Refers to 15A NCAC 13B North Carolina Solid Waste Management Rule Section .05XX.

2B Standards Surface water protection standards for the State of North Carolina contained in Rule 15A NCAC 02 titled "Classifications and Water Quality Standards Applicable to the Surface Waters and Wetlands of North Carolina," 15A NCAC 2B.

2L Standards: Groundwater protection standards for the State of North Carolina contained in Rule 15A NCAC 02 titled "Classifications and Water Quality Standards Applicable to the Groundwater of North Carolina," 15A NCAC 2L.

Summary

Coble's Sandrock, Inc. has applied for a lateral expansion of an existing facility. It will add 114.40 acres of adjacent property that will bring the total facility acreage to approximately 154.00 acres and increase total disposal capacity to approximately 6,935,903 cubic yards. The initial permit to construct expansion areas are designated Phase 3A (6.36 acres) and Phase 3B (5.87 acres) and they have a total capacity of 836,250 cubic yards. The average disposal rate is approximately 600 tons per day. No changes are proposed to increase the volume, rate (ton per day) or service area that the facility is approved for by the franchise approved by the Alamance County Board of Commissioner in 1994 and renewed in 2007.

The Coble's Construction and Demolition Debris Landfill (C&D Landfill) is owned and operated by Coble's Sandrock, Inc. The landfill facility is located at 5833 Foster Store Road, 1.5 miles east of the community of Kimesville, in Liberty, Alamance County, North Carolina. The facility consists of a total of 8 development phases. The first two Phases (Phases 1 and 2) are completed. The service life of proposed Phase 3 is approximately 10 years. Phase 4 through Phase 8 provide approximately 25 years of disposal capacity.

The existing C&D Landfill unit is permitted to dispose of land clearing/inert debris and construction/demolition debris resulting solely from construction, remodeling, repair or the demolition of pavement, buildings or other structures. Hazardous wastes or other banned wastes such as municipal or industrial solid wastes, liquid waste, medical waste, radioactive waste, asbestos contained material, PCB wastes, yard trash, white goods, septage, sludge, and special wastes are not approved for disposal. The

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facility will have a permitted capacity of approximately 6,935,903 cubic yards that will be filled at an average rate of approximately 600 tons per day.

The Division of Waste Management (Division) has determined that (i) the application for increasing the quantity of solid waste to be disposed in the landfill is a substantial amendment to the existing permit and (ii) the proposed construction and operation plans for Phase 3 expansion satisfies and complies with the requirements of the North Carolina Solid Waste Management Rules as codified in 15A NCAC 13B .0531, et seq.

The Solid Waste Section of the Waste Management Division (Division) has prepared Draft Solid Waste Permit 01-05 allowing the substantial amendment to the existing Coble's Sandrock C&D Landfill including an increase in waste disposal capacity, lateral expansion of the facility boundaries, and a Phase 3 lateral expansion of the landfill unit.

North Carolina Solid Waste Management Rules require a 45-day period to receive public comments on the draft permit. The 45-day period began June 22, 2008, and ended August 5, 2008.

The responses to the comments received by the NC DENR Division of Waste Management during the public comment period are provided below.

Final Determination

After consideration of the comments received during the public comment period referenced above, no technical issues were presented that would preclude the issuance of the permit to expand the Coble's C&D Landfill as proposed.

Comments and Responses

Comment 1: Several persons questioned the need to expand this landfill since other landfills are located in Alamance County.

Response: The location of solid waste facilities is approved through issuance of a franchise by the local government having jurisdiction over the site [NCGS 130A-294(b1)]. Documentation of the franchise award must be included in the application to the DWM for a landfill permit. DWM reviewed and confirmed that the application documentation (i) complies with the franchise requirements, and (ii) complies with the location and siting requirements found in the NC Solid Waste Rules.

Comment 2: Several persons pointed out that the landfill was an unlined landfill, and asked why a liner is not required at this landfill facility.

Response: Coble's C&D Landfill complies with the current Solid Waste Rule .0540 for the Construction of Construction and Demolition Landfills. The rule is effective for all existing C&DLF in North Carolina. The waste types eligible for disposal in C&DLF are limited to only wastes generated by construction and demolition activities. The landfill subgrade for the proposed Phase 3A and 3B meet the following vertical separation requirements stated in Rule 15A NCAC 13B .540(2):

- C&DLF unit(s) must be constructed so that the post-settlement bottom elevation of waste is a minimum of four feet above the seasonal high ground-water table and the bedrock datum plane contours established in the Design Hydrogeological Report.
- In-situ or modified soils making up the upper two feet of separation must consist of the following: SC, SM, ML, CL, MH or CH soils per Unified Soil Classification System or as specified in the approved construction plan.

Comment 3: Many persons questioned why other counties are allowed to bring their waste to Coble's C&DLF and expressed concern about the facility being a regional landfill.

Response: The service area, or the allowable locations from which waste may be accepted, is approved through issuance of a franchise by the local government having jurisdiction over the site [NCGS 130A-294(b1)]. Documentation of the franchise award must be included in the application to the DWM for a landfill permit. DWM reviewed and confirmed that the application documentation complies with the requirements found in the NC Solid Waste Rules.

Comment 4: One person questioned how deep in the ground can wastes be buried and does the Division check the depth?

Response: The Rules require that the landfill cell bottom (or landfill subgrade) must be engineered and constructed so that the post-settlement bottom elevation of waste is a minimum of 4 feet above the seasonal high ground-water table and the bedrock datum plane contours established in the Design Hydrogeological Report prepared in accordance with Rule 15A NCAC 13B .0538.

The Site Hydrogeologic Report and the Design Hydrogeological Report were determined to comply with Solid Waste Rule .0538. Upon completion of any landfill subgrade of each cell/unit, Solid Waste Rule 15A NCAC 13B .0540(5) requires the finished landfill subgrade be inspected and certified by a qualified geologist or engineer, and surveyed by a registered land surveyor. In addition, Coble's C&D Landfill must notify the Division's Hydrogeologist within 24 hours after the subgrade is completely constructed.

Comment 5: Many residents questioned siting the landfill in a residential area saying the population density of the area should prevent the landfill expansion and they felt they had no opportunity to voice their objections.

Response: The location of a landfill is approved through issuance of a franchise by the local government having jurisdiction over the site [NCGS 130A-294(b1)]. Documentation of the franchise award must be included in the application to the DWM for a landfill permit. Documentation of the franchise award was included in the application to the DWM for a landfill permit. DWM reviewed and confirmed that the application complies with the location and siting requirements found in the NC Solid Waste Rules.

Comment 6: One person requested that if Mr. Coble is granted the expansion permit, she wants to make sure that Coble's C&D Landfill is only allowed to proceed on two cells and that each 5-year phase permit be brought before the public.

Response: In accordance with Rule 15A NCAC 13B .0537, each proposed landfill phase provides approximately 5 years of operating capacity. For that reason, Permits to Operate (PTO) are valid for no more than 5 years from the permit issuance date. All North Carolina landfills consistently comply with the Rules with respect to public comment requirements and permit duration periods.

Neither the Statutes nor the Rules require each 5-year phase of operation to be publicly noticed if no change greater than 10% occurs in the (i) population served by the landfill, (ii) the quantity of solid waste disposed in the landfill, (iii) the geographic area served by the landfill, (iv) the category of waste to be disposed in the landfill, or (v) any other substantial change to the permit for the landfill.

Comment 7: One person asked what kind of appeals peoples are allowed to bring since they are the people affected the most.

Response: Appeals of permit decisions must be in accordance with Article 3 of the North Carolina General Statutes, Chapter 150B, and the Rules adopted thereunder. A notice with a summary of the rules and procedures are provided to parties who expressed an interest in the permit decision during the public comment period and are available by contacting the DWM at the address on the letterhead.

Comment 8: Many persons stated that they were told that Coble's C&D Landfill does not operate under the same guidelines as the Alamance County Construction Debris Landfill.

Response: All North Carolina C&DLFs are required to comply with applicable statutes and Solid Waste rules. However, revised C&DLF rules (Sections .0531 through .0547) became effective January 1, 2007. The existing C&DLF cells at both Alamance County and Coble's C&D Landfill comply with the regulations in effect prior to January 1, 2007 (Sections .0503 through .0505 and .0510). The design of the proposed new landfill phases at Coble's C&D Landfill would comply with the rules effective after January 1, 2007.

Since Alamance County also operates a MSW landfill, the County has the option of placing C&D waste in the in the C&D landfill or the lined MSW landfill.

Comment 9: Many persons referred to a monitoring report dated December 28, 2007, that noted the presence of debris, leaves and a tire at monitoring well MW-2. A question was asked whether the landfill can be properly managed if the landfill is allowed to expand.

Response: Monitoring wells at all North Carolina landfills are certified as constructed in accordance with the North Carolina Well Construction Standards contained in 15A NCAC 02C to ensure the wells produce representative water quality samples and are not contaminated by ground surface material. At Coble's C&DLF, each well has a metal well casing that extends approximately 3 feet above ground and is protected by a padlocked cap. In addition, each well is covered with a concrete pad and is sealed with bentonite grout up to 3-feet below ground surface. The operator placed a tire at MW-2 as a bumper guard.

The situation mentioned above was associated with a sampling event on December 28, 2007, involving monitoring well MW-2. The sample log indicated the well concrete pad was covered by debris, leaves and a tire. Although the situation was corrected by Coble's C&D Landfill and documented in subsequent audit reports and groundwater sampling reports, the ground surface material was not likely to adversely affect the sample data or the functioning of the well.

Comment 10: Many persons questioned that well samples have been listed in monitoring reports as discolored with odors and other defects at the landfill. The question was raised whether the residents should be concerned about the conditions of those well samples.

Response: Sampling logs for the October 2007 sampling event noted that the water samples from monitoring well MW-2 had an odor and sediment. Monitoring well water that sits dormant for extended periods commonly develop musty odors that result from soil bacteria living in the monitoring well casing. The condition can occur since a groundwater monitoring well is not purged or pumped on a frequent basis (twice per year for this case). The dormant conditions inside the well often results in the growth of iron- or sulfur-reducing bacteria around the well screen area. The bacteria use iron or sulfur in their life cycle and produce hydrogen sulfide gas as a by-product. The bacteria may form slimy colonies in well casings and screens. However, the odor is usually the most objectionable problem and has no effect on analytical results.

The water samples noted discoloration caused by the presence of sediment and fine mineral particles in the water column. The cloudy condition, referred to as turbidity, is due to the need to redevelop the well, which was performed and corrected the situation in the next round of samples.

Comment 11: Commenters noted that heavy metals such as chromium and barium have been found in monitoring well samples. Commenters noted that the sample was taken in during a drought and many wells were not tested because they were dry.

Response: In the October 2007 sampling event, the shallow well MW-1 and surface water monitoring points SW-1 and SW-2 could not be sampled because of exceptional drought conditions in North Carolina. All wells and surface water monitoring points were sampled in the following sampling event on April 15, 2008.

In the April 2000 sampling event, barium was detected in monitoring wells MW-1, MW-2 and MW-3 (which is to be closed and abandoned since it is located in proposed Phase 3 area) with concentrations ranging from 180 to 340 micrograms per liter ($\mu\text{g/L}$). The highest barium concentration of 340 $\mu\text{g/L}$ was found in the background well MW-3 (at the time, an upgradient well that was unlikely to be affected by a leachate release from the landfill). Barium was also detected in the April and October 2007, and April 2008 sampling events with concentrations ranging from 19.4 to 478 $\mu\text{g/L}$. All analytical results of barium are less than the North Carolina groundwater protection standard of 2,000 $\mu\text{g/L}$.

A commenter submitted documents showing a field filtered sample taken at MW-2. For the record, a split sample was taken, one portion was field filtered, and the other was unfiltered. The unfiltered sample was

analyzed and reported below the NC 2L Standard. The field filtered sample was taken for information purposes only.

Historical analytical results show total chromium concentrations in all wells, including the background wells, except MW-5. Except for the one sampling event discussed in Comment 16 below, total chromium results from the monitoring well samples are less than the 2L Standard for chromium of 50 µg/L. Total chromium was detected in MW-2 at a concentration of 121 µg/L, which exceeded the 2L Standard for total chromium in the October 11, 2007, sampling event. The well was resampled as allowed by the Solid Waste Rules in December 2007. The analytical result of the follow-up sample detected a chromium concentration of 15.7 µg/L, which was less than the respective 2L Standard. Subsequent testing has not indicated elevated levels that require any additional monitoring requirements.

The ground water monitoring program is in compliance with the Rules. Analytical results for the facility are consistently below ground water quality standards established under 2L.

Comment 12: A commenter referred to a letter from DWM to Joyce Engineering dated July 3, 2007, that questioned whether distance of a particular domestic well to the waste mass was less than 500 feet. The commenter was concerned that if a well is too close and becomes contaminated, then the water table may be jeopardized.

Response: In response to a Division letter dated July 3, 2007, Joyce Engineering, Inc., consultant for Coble's C&D Landfill performed additional work and submitted a revised Site Suitability Report dated July 19, 2007. In the submittal, the consultant certifies that the above-referenced residential well was not accurately located on the original site map Drawing No. 03 in the Site Suitability Report (Volume 1, Section 1) dated March 2006.

The well location was confirmed by triangulation using the distance from the well to the edge of the road pavement, the edge of the paved driveway, and the front of the house. The actual location of this well is 515 feet to the nearest edge of the proposed waste boundary. This information is contained in a revision to the Site Suitability Report dated July 19, 2007.

Comment 13: Data samples often incomplete due to damaged casings.

Response: Division staff reviewed monitoring reports and requested any information on damaged monitoring well casings from the operator's consultant. No damaged wells were reported. The Division is not aware of any damaged well at the facility.

Comment 14: Many persons commented that although constituent levels reported in groundwater samples were below State limits, the fact that the constituents were present raised a concern.

Response: The North Carolina Solid Waste Rules incorporate the groundwater quality standards contained in Rule 15A NCAC 02 "Classifications and Water Quality Standards Applicable to the Groundwater of North Carolina," 15A NCAC 2L (2L Standards) for the ground water monitoring programs at sanitary

landfills including Coble's C&D Landfill. The 2L Standards are health-based groundwater protection and drinking water standards provided under the NC DENR Division of Water Quality. Concentrations of constituents of concerns in groundwater that do not exceed of the 2L Standards meet the criteria in North Carolina for human consumption and exposure.

Ground water monitoring would continue with the expanded facility only with an expanded ground water monitoring system. The ground water quality analyses at Coble's C&D Landfill to present comply with the NC Solid Waste Rules, and otherwise require no additional actions.

Comment 15: Commenters asked that the required site study go beyond the scope that is contained in 15A NCAC 13B .0536 Site Study for C&DLF Facility to include the community and not just the landfill. Also, an extension to the public comment period was requested.

Response: Joyce Engineering, Inc., on behalf of Coble's C&D Landfill conducted and prepared the Site Suitability Report supporting the additional expansion to approximately 154.2 acres and the Design Hydrogeological Report for Phase 3 Development. The Division determined both reports meeting the criteria stated in Solid Waste Rule 15A NCAC 13B .0536 and issued approval for each on August 27, 2007 and December 12, 2007, respectively. All reports and data associated with the facility expansion and Phase 3 development submitted by the Coble's C&D Landfill are available as part of the administrative record.

The Franchise application process at the local level and the Site Suitability process at the State level are substantial and comprehensive. The Rules are provided as protection to human health, safety and the environment, as well as to protect the rights of citizens and applicants alike. No unusual or compelling criteria are presented to warrant additional study.

The public comment period was not extended for the following reasons: (i) the facility is currently operating within the parameters of the existing Permits to Operate and Construct, and within the parameters of the NC Solid Waste Management Rules and Law; (ii) the facility ground water monitoring system complies with the Solid Waste Rules and the results are below ground water protection standards; (iii) the facility operator promptly responded to inspection issues including drainage and odor issues; (iv) the application is in compliance with the NC Solid Waste Management Rules and Law; and (v) the facility has been permitted since 1998; and (vi) public notice was given for issuance of the local government franchise. The Division therefore determined that no additional comment period was necessary.

Comment 16: Several persons expressed concerns whether residential wells in the vicinity of the landfill are safe for use and consumption. Based on a 2007 groundwater report, a high concentration of chromium was detected. Several persons requested their well water to be tested by the Division prior to issuing a landfill permit. Other concerns were stated whether the exceptional draught conditions have any influence on the groundwater analytical results at the Coble's C&DLF.

Response: The landfill facility conducts semi-annually detection groundwater monitoring in accordance with the Groundwater Monitoring Plan approved by the Solid Waste Section on May 20, 2003, and with Solid Waste Rule .0544.

Groundwater samples are collected from the existing monitoring well network, which consists of 5 monitoring wells MW-1, MW-2, MW-4, MW-6 and MW-7, that monitors the ground water quality around the existing landfill Phases 1 and 2. The layout and design of the monitoring well network were developed and established from site-specific hydrogeological information obtained from extensive subsurface soil and groundwater investigation at site. The well MW-6 is the background or upgradient well that that is unlikely to be affected by a potential leachate release from the landfill units and is therefore used to establish the comparative baseline for ground water quality. The other 4 wells are designed and installed in the down-gradient and side-gradient directions of groundwater flow underneath the landfill units at the required distance from the waste mass.

The monitoring network would increase with the proposed landfill expansion. After development of proposed Phases 3A and 3B, the new monitoring network would consist of 8 wells: MW-2, MW-4, MW-6, MW-7, MW-8, MW-10S, P-19S and MW-11. Water samples collected from the monitoring wells are tested for constituents listed in the Appendix I of 40 CFR Part 258 plus Mercury, Chloride, Manganese, Sulfate, Iron, specific conductance, pH, temperature, alkalinity, and Total Dissolved Solids using USEPA methods SW-846 entitled Test Methods for Evaluating Solid Waste, Physical/Chemical Methods or methods approved by the Division. Groundwater quality at this facility is subject to the "Classifications and Water Quality Standards Applicable to the Groundwater of North Carolina," 15A NCAC 2L (2L Standards).

Groundwater analytical results from 2000 through present indicate that variations of several parameters were detected above the laboratory detection limits but less than their respective 2L Standards. In the October 11, 2007, sampling event Total Chromium was detected in MW-2 at a concentration of 121 microgram per liter ($\mu\text{g/L}$) that exceeded the 2L Standard of 50 $\mu\text{g/L}$. The well was resampled and tested as required by the Solid Waste Rules in December 2007. The analytical result of the follow-up sample detected a chromium concentration of 15.7 $\mu\text{g/L}$, which was less than the respective of 2L Standard.

Based on the historical and subsequent sampling results, the groundwater result from MW-2 in the October 2007 sampling event was determined to be an isolated incident. The facility complied with all regulations and the approved sampling and analysis plan in dealing with the incident. Other than resampling the well, the elevated parameter reading was not cause for additional action under the Solid Waste Rules.

If water quality samples test above 2L Standards, the Solid Waste Rules provide detailed procedures for corrective action that is protective of human health and the environment and would be implemented should monitoring results exceed the standards established by the NC DENR Division of Water Quality for ground water. Such response actions would include sampling and testing of off-site ground water wells.

The exceptional drought conditions causes lower ground water elevations, but is unlikely to affect the results of sampling analyses taken from the ground water monitoring wells. Also, field filtering of samples is not an acceptable practice for ground water analysis. Subsequent analysis were reviewed, and no further incidents were recorded.

Comment 17: Several persons expressed concerns that a creek near the landfill flows into the Haw River that then flows into Jordan Lake. They conclude the landfill is contaminating Jordan Lake. The question posed is why should they clean up Jordan Lake if the landfill run off is flowing into the creek?

Response: The facility is in compliance with rules that require the operator to implement and maintain storm water run-on and run-off controls.

Two drainage features are identified in and near the landfill facility: (1) a reach of Poppaw Creek is on the northeast corner and adjacent to the properties of the Coble's C&D Landfill and flows generally northeastward and eastward; (2) the un-named tributaries on the east and southeast sides of Coble's C&D Landfill that flow into Poppaw Creek.

To ensure the surface water quality of Poppaw Creek is not adversely impacted by the landfill operation, the landfill facility conducts semi-annual detection monitoring in accordance with the Groundwater Monitoring Plan approved by the Solid Waste Section on May 20, 2003.

The surface monitoring program consists of two (2) monitoring points. SW-1 serves as the background or upstream monitoring point and is located at the property line on the northwest side of the landfill. SW-2 serves as the downstream monitoring point and is located at the confluence of Poppaw Creek and an unnamed intermittent ditch located to east of the facility and receiving runoff from landfill units and discharges into Poppaw Creek.

Water samples collected from surface water monitoring points are tested for constituents listed in the Appendix I of 40 CFR Part 258 plus Mercury, Chloride, Manganese, Sulfate, Iron, specific conductance, pH, temperature, alkalinity, and Total Dissolved Solids and analyzed using USEPA methods SW-846 entitled Test Methods for Evaluating Solid Waste, Physical/Chemical Methods or methods approved by the Solid Waste Section. Surface water quality at this facility is subject to the "Classifications and Water Quality Standards Applicable to the Surface Waters and Wetlands of North Carolina," 15A NCAC 2B (2B Standards).

Surface water analytical results from 2000 through present indicate that parameters were detected above the laboratory detection limits but did not exceed the 2B Surface Water Standards except that in the April 2002 sampling event, total chromium was detected in SW-2 at a concentration of 310 µg/L. However, total chromium was also detected in the field blank sample used for quality control.

Since then, no detections of total chromium above 2B Standards occurred in any subsequent sampling events. Based on the analytical data collected from the water monitoring program, the surface water quality at the drainage features near the landfill facility are not adversely impacted by the landfill activities.

The landfill operator is required to implement and maintain drainage control and water protection by Rule 15A NCAC 13B .0542 (I). Best management practices of erosion and sedimentation control must be installed to divert surface water from the operation area.

The Solid Waste Rules provide detailed procedures for corrective action that is protective of human health and the environment, and would be implemented should monitoring results exceed the standards established by the NC DENR Division of Water Quality for surface water.

Comment 18: One person asked who would pay for the cleanup and restoration of water quality and for the water to be used during the restoration period if the groundwater becomes impaired due to a release from the landfill.

Response: If contamination occurs due to a verified release from any North Carolina C&D landfill including the existing or the proposed expansion at Coble's C&D Landfill, the facility operator is required to implement the assessment and/or corrective action procedures contained in Solid Waste Rule .0545. In summary, the procedures include notification of affected parties, determination of the nature and extent of the release, extensive additional monitoring requirements, assessment of corrective measures and remedies, taking actions that are protective of human health and the environment, implement the remedy, providing long-term financial assurance to ensure continuous funding of the corrective actions, operating and maintaining the corrective action remedy until completion unless otherwise approved as allowed under the Rules.

In summary, the permit holder is responsible for actions protective of human health and environment in the case of contamination resulting from a release from a C&D landfill including the restoration of ground water quality and the provision of potable water to affected residents.

Comment 19: Commenters stated that the size of the expansion is excessive and threatens the springs and wetlands in the area of the landfill, and that the environmental impacts to the wetlands and springs should be considered as described in 40 CFR 232.2(r).

Response: Wetlands are not present in the existing and proposed wastes disposal areas at Coble's C&D Landfill. The extents of wetlands were determined by professionals competent and trained in such activities and physically delineated by surveying and flagging the wetland areas. The U.S. Army Corps of Engineers visited the site and concurred with the delineation. Additionally, the wetlands are incorporated into the minimum of 200-foot buffer is established and along the landfill property boundaries, and a 50-foot buffer established between the existing and proposed waste disposal areas and known streams, rivers, lake, pond, or other waters of the state as defined in G.S. 143-212. Therefore, the landfill facility meets the landfill siting requirements in Rule 15A NCAC 13B .0536(c)(5).

Commenter's reference to 40 CFR 232.2(r) appears faulty. This is the only reference to the term from the 40 CFR 232.2:

- (4) Section 404 authorization is not required for the following: ...
- (ii) Incidental movement of dredged material occurring during normal dredging operations, defined as dredging for navigation in navigable waters of the United States, as that term is defined in 33 CFR part 329, with proper authorization from the Congress or the Corps pursuant to 33 CFR part 322; however, this exception is not applicable to dredging activities in wetlands, as that term is defined at § 232.2(r) of this chapter.

Division staff was told by a U.S. Army Corps of Engineers staff person that the paragraph has been deleted from the Code of Federal Regulations.

Comment 20: Commenters presented traffic concerns that included wastes including asbestos containing material, shingles and vermiculite dropped or blown off the hauling trucks, speeding dump trucks, increased traffic flow resulting in road congestion and road damage, and truck weight limits. Commenters requested a traffic study be conducted and evaluated prior to making decision of permitting landfill expansion.

Response: Regarding traffic: The proposal to the existing operations is to expand the property area approved for future disposal, but does not request an increase in daily disposal tonnage or activities. The geographic service area for the facility as approved by Alamance County in the facility franchise remains unchanged. The application is consistent with past performance based on historical daily tonnage received at the facility and is therefore not expected to increase vehicular traffic to or from the landfill.

Asbestos containing material is allowable for disposal at C&D landfills in North Carolina certain conditions addressed in the NC Solid Waste Management Rules. However, the franchise agreement between Coble's C&D Landfill and Alamance County does not allow asbestos disposal. Except for isolated incidents that were addressed by the operator, landfill inspections have found the operations to be consistent with permit conditions and the NC Solid Waste Management Rules.

Of note is that North Carolina Solid Waste permits are only issued in 5-year increments. Approval of the expansion will allow for the issuance of more 5-year disposal permits, but not additional daily traffic. Neither the Solid Waste Rules nor the General Statutes require traffic studies for existing disposal facilities.

Regarding litter issues: The regulatory authority of the NC Division of Waste Management does not extend to litter-related issues. However, residents are encouraged to contact the North Carolina Department of Transportation Swat-A-Litterbug Program to report littering incidents by either e-mail at:

http://www.ncdot.org/doh/Operations/dp_chief_eng/roadside/Beautification/Litterbug/salform.html

or by calling the Customer Service Office at 1-877-DOT-4YOU (1-877-368-4968).

Comment 21: Several persons asked what if the landfill catches fire and who would pay if a disastrous fire or other calamity occurs?

Response: The operator of Coble's C&D Landfill has conducted fire safety requirements in accordance with the Division-approved Operation Plans that was prepared by Coble's C&D Landfill in compliance with Rules 15A NCAC 13B including the following fire safety requirements:

- Open burning of solid waste is prohibited except for the approved burning of land clearing debris generated on-site or debris from emergency clean-up operations. Prior to any burning a request must be sent to the Division for review and approval.
- Equipment must be provided to control accidental fires and arrangements made with the local fire protection agency, specifically the Snow Camp Fire Department, to provide immediate fire-fighting services.
- Fires and explosions that occur at the landfill must be reported to the Division within 24 hours and a written notification must be submitted within 15 days. Written notification must include the suspected

cause of fire or explosion, the response taken to manage the incident, and the action(s) to be taken to prevent the future occurrence of fire or explosion.

- Six-inch earthen material must be placed over solid wastes when the waste disposal area exceeds one-half acre and at least once weekly or at more frequent intervals if necessary to control disease vectors, fires, odors, blowing litter, and scavenging. A notation of the date and time of the cover placement must be recorded in the operating record.
- A Gas Monitoring Plan is developed, approved and implemented to prevent fires or explosions from methane gas or other explosive gas. The plan is prepared in accordance with Rule 15A NCAC 13B .0544(d).

The operator is responsible for containing and controlling fires including monetary costs.

Comment 22: Several complaints and allegations were submitted and are grouped below.

- A commenter alleged that retired and fired workers from Coble's C&D Landfill spoke of adding water to wells before test days, disposing a truck load of automotive batteries in the landfill, allowing disposal of asbestos in labeled bags, adding debris to closed areas after inspection, taking household trash, and other concerns.
- Residents in the vicinity of landfill submitted complaints about hearing noises and feeling vibrations from landfill operation that sometimes occurred outside the permitted operating hours.
- Residents submitted complaints of unpleasant odors that smelled like battery acid or an open toilet, and dust blowing from landfill operation covers cars, trees, and structures.
- Commenters complained that Coble's C&D Landfill received waste that was not C&D. Other persons expressed concerns whether the staff at Coble's C&D Landfill check the waste that is buried in the landfill and charged that ineligible wastes were disposed in Coble's C&D Landfill.
- A resident suggested that their farm pond was damaged by dirt and sediment draining from landfill area.
- Commenter submitted a statement regarding tire disposal at Coble's C&D Landfill.
- A commenter suggested that trucks and equipment were running at 1, 2, 3 o'clock in the morning.

Response: A review of the facility records at the Division shows that staff has responded to numerous complaints and concerns over the years including receipt of out-of-County waste, potential ground water problems, monitoring, the potential receipt of hazardous waste, traffic, road conditions, concerns regarding the lack of state monitoring, ineffective waste screening, mobile home deconstruction, franchising and the lack of state involvement in the franchising process, sedimentation, and the lack of EPA involvement. In addition, Division of Land Quality staff visited the site regarding siltation in a nearby hand-dug well based on a complaint.

Issues within the scope of the Division's regulatory authority were satisfactorily addressed. For example, erosional issues were satisfactorily addressed in 2001, and odors were identified as generated by bulk disposal of gypsum wall board (sheet rock) in 2004. In both instances, the responses are considered to be successful interactions of the public, the permit-holder and Division staff. The mitigation measures were successful and recurrences have not been witnessed by on-site inspections or reported since.

All North Carolina sanitary landfill facilities are inspected unannounced by the Division on a periodic basis. A compliance inspection at a facility reviews all records required to be maintained by the facility operator that establish and document regulated facility activities. In addition, public complaints are logged and responded to with follow-up reports compiled. The system of compliance verification is consistent as documented by the Solid Waste Section's Field Operations Branch.

The Division encourages citizens with direct, documentable knowledge of illegal activity at a solid waste management facility to provide the information to the Division as soon as possible. Some public comments received, however, are undocumented allegations that cannot be appropriately addressed in this Public Comment process. If documentation is presented to the Division establishing the authenticity of the allegations, then the Rules and Statutes provide adequate methods for dealing with those violations at any time as has occurred in the past.

In summary, monitoring, inspections and the facility operating record document that Coble's C&D Landfill is in substantial compliance with their permit, the Solid Waste Rules, and applicable laws with no outstanding compliance issue that would preclude issuance of the expansion permit.

Comment 23: A person asked what are the methane gas and other chemicals doing to the inhabitants of Kimesville?

Response: The facility complies with the requirements in the Rules and the existing permit to monitor for explosive gas, including methane, and ground water contamination on a periodic basis. Chemical exposure to the public of any material from the landfill is consistently measured to be within the limits for human health and safety as established in applicable State Rules or regulations.

Fortunately, methane gas generation at C&D landfills is a minor concern due to the small fraction of disposed organic waste that readily decomposes such as food and paper waste, which is necessary for the generation of significant levels of methane. The waste material that is accepted at Coble's C&D Landfill for disposal is generally inert or slowly decomposes and produces insignificant amounts of methane gas.

Comment 24: Is there any rule to regulate the disposal of asbestos-containing waste such as vermiculite, German shingle in Coble's C&D Landfill?

Response: In the past, Coble's C&D Landfill accepted and disposed wastes containing asbestos in landfill Phases 1 and 2 areas. The asbestos waste was disposed in bulk apart from other solid wastes at the lowest level of the open disposal area (at the toe of the working face) or in an area not contiguous with other disposal areas then covered immediately with soil to prohibit airborne conditions. Those areas were recorded so that asbestos is not accidentally exposed by future land-disturbing activities. The activity was in compliance with NC Solid Waste Rules and the permit.

The franchise agreement between Coble's C&D Landfill and Alamance County that approves the expansion does not allow the disposal of asbestos containing material. The Permit to Operate would be consistent with the franchise.

Comment 25: Some commenters expressed concern about whether a connection between cancer or other illness can be correlated to the proximity of the landfill.

Response: The facility is in compliance with all monitoring criteria related to human health and safety. Ground water monitoring data is conclusively below levels that would adversely affect human health and safety. The Division is not aware of and has not received any scientific data or reports that associate the activities of permitted and operating landfills in North Carolina to illness in residents living in the vicinity of the landfill including the existing Coble's C&D Landfill.

Comment 26: A commenter stated that they can see a mountain of landfill through their living room window in the wintertime.

Response: Although visibility and aesthetic concerns associated with the proposed landfill are not technical concerns in the State Rules and statutes, the Division recognizes that landfills increase goodwill in the surrounding communities when landscaped to be less obtrusive. If the permit expansion is approved, the Division can help mitigate some aesthetic issues by requiring the operator establish groundcover on outward facing side slopes. The operator will be encouraged to plant evergreen vegetation where feasible to minimize visual impacts to the neighbors.

Comment 27: Many comments were submitted regarding the perceived adverse impact of the landfill on their property values.

Response: Although historical sales prices were not available for all properties, a review of various Alamance County tax records with historical sales prices for properties located near and abutting the facility property did not find any diminishment in property values.

Comment 28: A commenter questioned the use of wastewater sludge as a soil amendment when the permit does not allow the disposal of wastewater sludge.

Response: Solid Waste Rule .0542(d) prohibits the disposal of wastewater treatment sludge, but conditionally allows the use of treated wastewater sludge applied at agronomic rates in the final cover for promoting vegetative growth. The use is limited to a depth of less than 6-inches, and may only occur after submittal of written work to the Division for review and approval. The proposed permit condition is consistent with the Rule. The application of treated residuals is regulated by the NC Division of Water Quality Aquifer Protection Section Land Application Unit.

Comment 29: A commenter submitted documents marked 'unofficial' and declared that a Deed of Trust (Deed Book 1937 Page 398) covering 19.12 acres of Coble's C&D Landfill property (Deed Book 1432 Page 0506) exists that contains the statement "Borrower shall not cause or permit the presence,

use, disposal, storage, or release of any Hazardous Substances, or threaten to release any Hazardous Substances on or in the property.”

The commenter stated: (i) that the applicant needs to submit to the Division a written document confirming the lender listed in the Deed of Trust understands and acknowledge the property stated in the Deed is and will be used as the landfill facility and recorded in the Register of Deeds office of Alamance County; and (ii) that a waiver from the lender stating that the State of North Carolina is not and will not be legally or financially responsible for Coble's Sandrock, Inc., and Mr. Kent Lee Coble and Mrs. Brenda Lamm Coble to fulfill any requirement governed in the Deed of Trust if the Division approves and issues Coble's Sandrock, Inc., a solid waste management permit.

Response: The Division has no regulatory authority over the property financial transaction and proceedings between the lending institution and the applicant. Any contractual arrangements between the two parties are not regulated or enforced by the Division. The applicant established legal ownership of the property and nothing in the deed prohibits the land use as a landfill as required.

A deed notification was filed with the Alamance County Register of Deeds for the existing facility property stating that a landfill exists on the property.

The following are observations regarding the submittals.

The “Hazardous Substances” as defined in Section 21 of the document marked unofficial is not the same definition as provided under State or Federal statutes. If approved, the permit for expansion of the disposal area will comply with the State definition for disposal of nonhazardous construction and demolition waste, and will not permit the disposal of hazardous waste.

Should the permit action to expand the facility be approved, a new deed notification must be filed with the Alamance County Register of Deeds for the additional property. The State of North Carolina will not waive the Financial Assurance requirements for the Closure, Post-Closure and Corrective Actions for operation of the facility.

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| No. | Name | Address | City | State | Zip | Comment Cross Reference No. |
|-----|---|------------------------------------|---------------|-------|-------|--------------------------------------|
| 1. | Bonnie Sharpe | 4171 W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 2. | Cecilia Chester | 6231- C Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 3. | Chad Martin | 5404 Foster Store Rd. | Liberty | NC | 27298 | No Comment |
| 4. | Charles Bowman | 5672 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 5. | David and Glenda Sharpe | 6462 Mt. Herman Rock Creek Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 6. | David Mickey, Blue Ridge Environmental Defense League | 332 Shady Grove Church Rd. | Winston-Salem | NC | 27107 | 15, 28 |
| 7. | Dee Willets | 3675 Euliss Rd. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 8. | Drew and Gladys Loy | 4461 Friendship Patterson Mill Rd. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 9. | Elsa Cole | 542 S. Rosa Ct. | Burlington | NC | 27215 | 17, 26 |
| 10. | Eric and Tonya Brewer | 6308 Jim Pickett Rd. | Snow Camp | NC | 27349 | No Comment |
| 11. | Erin Tippins | 5740-B Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 12. | Etta Jean and Leonard Lineberry | 6864 Sawyer Rd | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 13. | Heather and Daniel Hamby | 6231-D Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 14. | Heather Woodard | 8264 Hwy. 49 South | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |

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|-----|---------------------------------|--------------------------------------|------------|-------|-------|--------------------------------------|
| 15. | Henry Vine | 3450 Isley Dr. | Snow Camp | NC | 27349 | No Comment |
| 16. | Ivan and Willie Mae Foster | 3853 W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 17. | James Arey, Jr | 6247 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 18. | James Burke | 5805 Foster Store Rd. | Liberty | NC | 27298 | General Statement in Support |
| 19. | Jamie and Dale Smith | 4664 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 20. | Janice W. Shoffner | 4736 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 21. | Janie Wells | 4465-C W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 22. | Jason and Suzanne Butler Sharpe | 6452 Mt. Herman Rock Creek Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 23. | Dean Ward | 1143 Challenge Dr. | Graham | NC | 27253 | General Statement in Support |
| 24. | Jeff and Crystal Humble | 4073 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | No Comment |
| 25. | Jenny Johnson | 3934 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | No Comment |
| 26. | Jesse and Joel Cole | 6033 Foster Store Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 27. | Jesse Rojas | 8250 Hwy. 49 South | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 28. | Jim Wood | 4557-H Friendship Rock Creek Rd. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |

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|-----|---------------------------------------|------------------------------------|------------|-------|-------|--|
| 29. | John Knight | 3610 Kimesville Rd. | Burlington | NC | 27215 | 3, 5, 21, 22 |
| 30. | Janna and Chris Wimbish | 4557 Friendship Rock Creek Rd. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 31. | Joyce C. and Max V. Hudson | 6238 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 32. | Julie Perkins | 4211 Spoon Loop Rd | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 33. | Kelly Denise Butler | 627 Oakmont Dr. | Asheboro | NC | 27203 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 34. | Kenneth F. and Joan C. Johnson | 6033 Foster Store Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 23, 25, 26, 27 |
| 35. | Kenneth Ray and Pasty Norris Mitchell | 4117 W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 24, 25, 27 |
| 36. | Kimberly Bowman | 5518 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 37. | Kristina Wilkerson | 6362-B Mt. Herman Rock Creek Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 38. | Laura, Delores and James Arey | 6247 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 28, 29 |
| 39. | Leasa and Michael C. Henry | 6400 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 40. | Lori, Anita, Ken and Ryan Smith | 3407 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 41. | Louise Clapp | 4531 Alamance Church Road | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 42. | Lucy and Clifton Clapp | 5504 Foster Store Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |

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|-----|---|-------------------------------------|---------|-------|-------|--------------------------------------|
| 43. | Marsha Strader | 6346 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 44. | Mary Hensley | 6432 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 45. | Matthew Jones | 4118H W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | General Statement in Support |
| 46. | Michael and Luci Spivey | 6257 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 47. | Michelle and Robbie Mayton | 5337 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 48. | Nancy Johnson | 5342 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 49. | Nancy S., Albert Boyce and Barbara E. Johnson | 6155 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 50. | Ned, William, Terri and Rebecca Foster | 6319 Foster Store Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 51. | Pamela Dawn Shepherd | 5523 Eulis Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 52. | Pat Moore | 6048 Old 421 Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 53. | Patricia A. Hawkins | 4431 W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 54. | Paula and Tom Orel | 4118C W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | No Comment |
| 55. | Robert L. Lowe | 5524 Eulis Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 56. | Roger and Sue Edwards | 4620 Stafford Mill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |

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|-----|--------------------------------|-------------------------------------|------------|-------|-------|--------------------------------------|
| 57. | Roger Owens | Coble Mill Rd. | Snow Camp | NC | 27349 | General Statement in Support |
| 58. | Ruth Curl | 4259C W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 59. | Sammy and Sue McBride | 4050 Spoon Loop Rd. | Liberty | NC | 27298 | No Comment |
| 60. | Sandra and Scott Johnson | 4560 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 61. | Shannon Graves-King | 2672 Jacob's Trail | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 62. | Sharon Loy and David M. Butler | 4731 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 63. | Sterling S. Hensley | 4423 W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 27 |
| 64. | Tegan Mayo Pearce | 4465-A Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 65. | Thomas and Bonnie Gregory | 3620 Eulis Rd. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 66. | Tomas Murawski | P.O. Box 431 | Graham | NC | 27253 | No Comment |
| 67. | Velma Gibson | 4415 W. Greensboro-Chapel Hill Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 68. | Wanda and Mauri Cox | 4305 Spanish Oak Hill Rd. | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 69. | Wendell S. Tucker | 4406 Fern Glen Dr. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 70. | Willie and Billy Holiday | 1649 Major Hill Rd. | Snow Camp | NC | 27349 | General Statement in Support |

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|-----|-------------------------|-----------------------------------|------------|-------|-------|---|
| 71. | Willie Holliday | 1841 Major Hill Rd. | Snow Camp | NC | 27349 | General Statement in Support |
| 72. | Howard and Reva Hudson | 6019 Kimesville Rd. | Liberty | NC | 27298 | 26, 27 |
| 73. | Delores H. Arey | 6247 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25, 29 |
| 74. | Kenneth F. Johnson | 6033 Foster Store Rd. | Liberty | NC | 27298 | 3, 5, 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 75. | Joan C. Johnson | 6033 Foster Store Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 76. | Thomas S. Gregory, P.E. | 3620 Eulis Rd. | Burlington | NC | 27215 | 2, 8, 9, 10, 11, 12, 13, 14, 15, 19, 22, 25 |
| 77. | Alan and Heather Jones | 6049 Friendship Rock Creek Rd. | Snow Camp | NC | 27349 | 21, 23 |
| 78. | Carolyn Coble Sharpe | 4174 W. Greensboro-Chapel Hill Rd | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 79. | Betty G. Phillips | 4244 W. Greensboro Chapel Hill Rd | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 80. | Alex Jernigan | 4336 W. Greensboro Chapel Hill Rd | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 81. | Janet Allen | 6432 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 82. | Joyce Ferguson | 6364 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 83. | Brian Woodward | 8250 Hwy. 49 South | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 84. | Adolph Woodward | 8250 Hwy. 49 South | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |

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Cross Reference Listing

Coble's C&D Landfill Proposed Expansion

| No. | Name | Address | City | State | Zip | Comment Cross Reference No. |
|-----|-----------------|------------------------------------|------------|-------|-------|----------------------------------|
| 85. | Susan Woodard | 8250 Hwy. 49 South | Snow Camp | NC | 27349 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 86. | Jo An Restivo | 1800 Brown St | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 87. | J. H. Arey | 6247 Kimesville Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 88. | Robert E. Loy | 4365 Friendship Patterson Mill Rd. | Burlington | NC | 27215 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 89. | Randall S. Lowe | 5510 Eulis Rd. | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 90. | Armp J. Layton | 3806 W Greensboro Chapel Hill Rd | Liberty | NC | 27298 | 8, 9, 14, 15, 16, 18, 19, 22, 25 |
| 91. | Anne Allen | PO Box 738 | Snow Camp | NC | 27349 | 21, 25 |
| 92. | Hazel Bowman | 5718 Kimesville Rd | Liberty | NC | 27298 | 4, 21, 25 |

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